

## **REMARKS**

Claims 1, 2, 12, 21, 27, 32, 33, 36, 38, 41, 48 and 52 have been amended. Claims 1-59 are pending in the application. Reconsideration is respectfully requested in light of the following remarks.

### **Objections to the Specification and Claims:**

The Examiner's objections to the specification and claims have been addressed by the amendments above. A limitation of claim 38 was inadvertently omitted from previous claim listings. As shown above, claim 38 has been restored to its original and proper form.

In light of the above amendments, withdrawal of all objections to the specification and claims is respectfully requested.

### **Section 112, Second Paragraph, Rejection:**

The Examiner rejected claims 1, 12, 33, 36, 41, 48 and 52 under 35 U.S.C. § 112, second paragraph as being indefinite. Specifically, the Examiner asserts that recitation of "a computer program process" renders these claims indefinite. Applicants respectfully traverse this rejection and assert that claims 1, 12, 33, 36, 41, 48 and 52 are not indefinite. There is nothing about reciting that a computer program process performs one or more actions, functions or other method limitations. One of ordinary skill in the art would be able to readily ascertain the metes and bounds of Applicants' claims.

However, in an effort to further prosecution, claims 1, 12, 33, 36, 41, 48 and 52 have been amended for clarity. As such, removal of the §112, second paragraph rejection of these claims is respectfully requested. These amendments are not made for a reason of patentability and do not change the meaning or scope of the claims.

The Examiner rejected claims 21 and 27 under 35 U.S.C. § 112, second paragraph, as being indefinite, asserting that there is insufficient antecedent basis for the limitation, “said computer readable memory.” Applicant traverse this rejection and not that the minor typographical error noted by the Examiner does not rise to the level of indefiniteness as one of ordinary skill in the art would have easily understood the claims. Applicants have amended claims 21 and 27, correcting a minor typographical error. These amendments are made for clarity and not made for a reason of patentability. These amendments do not change the meaning or scope of the claims.

The Examiner rejected claims 1-10, 12-20, 41-47 and 48-50 under 35 U.S.C. § 112, second paragraph, as being “unduly multiplied.” The Examiner asserts, “Applicants present an unreasonable number of claims which are repetitious and multiplied, the net result of which is to confuse rather than to clarify” citing 37 CFR 1.75(b) and MPEP 2173.05(n)). The Examiner has further stated that “Applicants’ reply **must include a selection** of claims for purpose of examination” (emphasis by Examiner, Office Action, p. 4) and has divided Applicants’ claims into various sets. Specifically, the Examiner asserts that Applicants must select between claims 1-10 and 48-50 as well as between claims 12-20 and claims 41-47.

Applicants respectfully traverse this rejection and assert that Applicants’ claims are not unduly multiplied or repetitious. Further, Applicants’ claims do not “confuse rather than clarify” as asserted by the Examiner. In response to the request to select between claims 1-10 and 48-50, Applicants select claims 1-10 **WITH TRAVERSE**. In response to the request to select between claims 12-20 and 41-47, Applicants select claims 12-20 **WITH TRAVERSE**.

Regarding the Examiner’s assertion that claims 1-10 and 48-50 are unduly multiplied and repetitious, Applicants respectfully disagree with the Examiner. Firstly, the Examiner has provided absolutely no analysis or comparison of the claims and reasoning as to why one of ordinary skill in the art would be confused by the claims. The Examiner’s rejection is entirely conclusory and unsupported. Therefore, the Examiner

has failed to state a *prima facie* rejection. Moreover, claims 1-10 and 48-50 are clearly not unduly multiplied or repetitious. These two sets of claims only include a total of only 13 claims. Thirteen total claims between these two sets can hardly be said to be unduly multiplied. Furthermore, there are numerous differences in scope between the two sets of claims. For instance, claim 48 recites, in part, “receiving a first resource definition from a first administrator” and “receiving a second resource definition from a second administrator” whereas none of claims 1-10 recite anything about receiving resource definitions from administrators. Similarly, claim 49 recites, in part, “receiving a first source resource definition from said first administrator” and claim 50 recites, “receiving a second source resource definition from said second administrator.” None of claims 1-10 recite anything about receiving source resource definitions from administrators. Thus, claims 48-50 are not unduly multiplied or repetitious claims when compared to claims 1-10. While independent claims 1 and 48 may be of *similar* scope, they are not duplicate, unduly multiplied or repetitious claims.

Additionally, the various dependent claims (e.g., claims 2-10 and 49-50) are not multiplied or repetitious, contrary to the Examiner’s assertion. For example, claim 2 recites, in part, “ defining a correlation rule; and associating each information object from said second set of information objects with the corresponding user from said set of users based on said correlation rule” which is not recited in any of claims 48-50. Similarly, claim 3 recites, in part, “defining a correlation rule; ... and rejecting duplicate users from said set of users based on said correlation rule,” which is not recited in claims 48-50.

Given the clear differences between the two sets of claims, the §112, second paragraph rejection of claim 1-10 and 48-50 is improper and removal thereof is respectfully requested.

Regarding the Examiner’s assertion that claims 12-20 and 41-47 are unduly multiplied and repetitious, Applicants respectfully disagree with the Examiner. Firstly, the Examiner has provided absolutely no analysis or comparison of the claims and reasoning as to why one of ordinary skill in the art would be confused by the claims. The

Examiner's rejection is entirely conclusory and unsupported. Therefore, the Examiner has failed to state a *prima facie* rejection. Moreover, claims 12-20 and 41-47 are not unduly multiplied or repetitious. These two sets of claims only include a total of only 16 claims. Sixteen total claims between these two sets can hardly be said to be unduly multiplied. Furthermore, there are numerous differences in scope between the two sets of claims. For example, claim 12 recites, in part, "defining at least one computer-implemented source resource containing a first set of user accounts from which a set of users are discoverable" and "using the definition for each at least one source resource to discover said set of users *based on said set of user accounts*" while claim 41 recites, in part, defining a computer-implemented first resource containing information objects defining at least one user from a set of users" and "using the definition to discover said information objects *based on said first resource definition*." Thus, while claim 12 recites using a defined source resource containing a set of user accounts and using the definition to discover the set of users *based on the set of user accounts*, whereas claim 41 recites defining a resource containing information objects defining at least one user from a set of users and using the definition to discover information objects *based on the resource definition*. Thus, while independent claims 12 and 41 may be of similar scope, they are clearly not repetitive or unduly multiplied in contrast to each other.

Similarly, dependent claims 13-20 and 42-47 are also not unduly repetitive or multiplied. For instance, claim 45 recites, in part, "maintaining a resource account list for each virtual identity, wherein the resource account list for each virtual identity lists the resource accounts with which the corresponding user is associated and the resource from which each resource account was discovered." None of claims 12-20 recite this limitation as recited in claim 45.

Thus, the clear differences between claims 12-20 and 41-47 demonstrate that the claims are not, contrary to the Examiner contention, unduly multiplied or repetitive. The §112, second paragraph, rejection of claim 12-20 and 41-47 is thus improper and removal thereof is respectfully requested.

## CONCLUSION

Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-96801/RCK.

Respectfully submitted,

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